

1 CiCi CUNNINGHAM, ESQ.
 Nevada Bar No. 4960
 2 LAW OFFICE OF CiCi CUNNINGHAM
 3 *A Professional Corporation*
 2831 St. Rose Parkway, Suite 251
 4 Henderson, NV 89052
 Telephone: (702) 932-7763
 5 Facsimile: (702) 818-1065
 6 CiCiEsq@cox.net
 Proposed Attorney for Debtors-In-Possession

FILED ON: September 17, 2011

7
 8 **UNITED STATES BANKRUPTCY COURT**
DISTRICT OF NEVADA

9 In Re:)	Case No.: 11-15796-BAM
)	Chapter 11
10 JOSE UNSON and ELSA UNSON,)	
)	
11)	
12 Debtors.)	Hearing:
)	Date: October 18, 2011
13 Address: 1348 S. Barranca Avenue)	Time: 9:00 am
Glendora, CA 91740)	
14)	
15)	

16 NOTICE OF MOTION TO VALUE COLLATERAL, "STRIP OFF" AND MODIFY
 17 RIGHTS OF UNSECURED CREDITORS PURSUANT TO 11 U.S.C.
 § 506(a) AND § 1123 FOR THE REAL PROPERTY LOCATED AT
 18 **1254 FRAYA DRIVE, LAS VEGAS, NV 89119**

19
 20 TO: THE HONORABLE BRUCE A. MARKELL
 ALL INTERESTED PARTIES, CREDITORS AND TRUSTEES

21 NOTICE IS HEREBY GIVEN that on September 17, 2011, a MOTION TO VALUE
 22 COLLATERAL, "STRIP OFF" AND MODIFY RIGHTS OF UNSECURED CREDITORS
 23 PURSUANT TO 11 U.S.C. § 506(a) AND § 1123 FOR THE REAL PROPERTY LOCATED
 24 AT 1254 Fraya Drive, Las Vegas, NV 89119, was filed by CiCi Cunningham,
 25 Esq. of the LAW OFFICE OF CiCi CUNNINGHAM, proposed counsel for Debtors. Any
 26 opposition must be filed pursuant to Local Rule 9014(d).
 27
 28

LAW OFFICE OF CiCi CUNNINGHAM
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1 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
2 sought in the Application, or if you want the Court to consider your views on the Application,
3 then you must file an opposition to each application with the Court, and serve a copy on the
4 person making the Motion ***no later than 14 days*** preceding the hearing date for the applications,
5 unless an exception applies (see Local Rule 9014(d)(3)). The opposition must state your
6 position, set forth all relevant facts and legal authority, and be supported by affidavits or
7 declarations that conform to Local Rule 9014(c).
8

9
10
11 If you object to the relief requested, you *must* file a **WRITTEN** response to the pleading with
12 the court. You *must* also serve your written response on the person who sent you this notice.

13 If you do not file a written response with the court, or if you do not serve your written response
14 on the person who sent you this notice, then:

15 The court may *refuse to allow you to speak* at the scheduled hearing; and

16 The court may *rule against you* without formally calling the matter at the hearing
17

18 **NOTICE IS FURTHER GIVEN** that the hearing on the said Application will be held
19 before Judge Markell in the Foley Federal Building, 300 Las Vegas, Boulevard South, Las Vegas,
20 Nevada, on the 18th day of October, 2011 at 9:00 am.

21 Dated this the 17th day of September, 2011.
22

23 Respectfully Submitted,
24 LAW OFFICE OF CiCi CUNNINGHAM
25 A Professional Corporation

26 By: 

27 CiCi Cunningham, Esq
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was sent via ELECTRONIC MAIL on September 17, 2011 to the following:

Notice is being electronically mailed to:

JEREMY T BERGSTROM on behalf of Creditor BANK OF AMERICA, N.A., SUCCESSOR BY MERGER TO BAC HOME LOANS SERVICING, LP FKA COUNTRYWIDE HOME LOANS SERVICING, LP mbergstrom@mileslegal.com

CICI CUNNINGHAM on behalf of Debtor JOSE UNSON
ciciesq@cox.net

PHILIP S. GERSON on behalf of Debtor JOSE UNSON
banknv@rocgd.com, mburgener@rocgd.com

CHRISTOPHER M. HUNTER on behalf of Creditor Aurora Loan Services LLC, its assignees and/or successors
bknotice@mccarthyholthus.com,
chunter@mccarthyholthus.com;nvbkcourt@mccarthyholthus.com

CHRISTOPHER K LEZAK on behalf of Creditor Aurora Loan Services LLC, its assignees and/or successors
bknotice@mccarthyholthus.com,
nvbkcourt@mccarthyholthus.com;clezak@mccarthyholthus.com

MATTHEW M. MCARTHUR on behalf of Creditor Aurora Loan Services, LLC
mmcarthur@piteduncan.com, ecfvb@piteduncan.com

U.S. TRUSTEE - LV - 11
USTPRegion17.lv.ecf@usdoj.gov

I HEREBY CERTIFY that a true and correct copy of the above-mentioned notice was sent via regular mail, sufficient postage prepaid on September 17 to the following:

BAC Home Loans Servicing, LP
1757 Tapo Canyon Road
Mail Stop: CA6-913-LB-11
Simi Valley, CA 93063

LAW OFFICE OF CICI CUNNINGHAM
2831 ST. ROSE PARKWAY, SUITE 251, HENDERSON, NEVADA, 89052
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1 GINA M CORENA on behalf of Creditor BANK OF AMERICA, N.A., SUCCESSOR BY
2 MERGER TO BAC HOME LOANS SERVICING, LP FKA COUNTRYWIDE HOME LOANS
3 MILES, BAUER, BERGSTROM & WINTERS, LLP
4 2200 PASEO VERDE PKWY, STE 250
5 HENDERSON, NV 89052

6 CICI CUNNINGHAM
7 LAW OFFICE OF CICI CUNNINGHAM
8 2831 ST ROSE PARKWAY, SUITE 251
9 HENDERSON, NV 89052

10 PHILIP GERSON
11 OLSON, CANNON, GORMLEY & DESRUISSEAU
12 9950 WEST CHEYENNE AVE
13 LAS VEGAS, NV 89129

14 DEAN PROBER on behalf of Creditor BAC Home Loans Servicing, LP
15 20750 VENTURA BOULEVARD SUITE 100
16 WOODLAND HILLS, CA 91364

17 RECOVERY MANAGEMENT SYSTEMS CORPORATION
18 25 S.E. SECOND AVENUE
19 INGRAHAM BUILDING, SUITE 1120
20 MIAMI, FL 33131-1605

21 Saxon Mortgage Services, Inc.
22 c/o Aldridge Connors LLP
23 780 Johnson Ferry Rd. NE
24 Suite 600
25 Atlanta, GA 30342

26 I HEREBY CERTIFY that a true and correct copy of the above mentioned motion was
27 served via certified mail on September 17, 2011 to the following:

28 Bank of America
P.O. Box 5170
Simi Valley, CA 83065

Bank of America
P.O. Box 650070
Dallas, TX 75265-0070

Bank of America
7105 Corporate Drive
Plano, TX 75024

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- 1 Bank of America
- 2 P.O. Box 515503
- 3 Los Angeles, CA 90051-6803
- 4 Bank of America
- 5 P.O. Box 17054
- 6 Wilmington, DE 19850
- 7 Bank of America
- 8 450 American St. #SV416
- 9 Simi Valley, CA 93065
- 10 Bank of America
- 11 P.O. Box 21848
- 12 Greensboro, NC 27420-1848
- 13 JP Morgan Chase Bank, National Association
- 14 3415 Vision Drive
- 15 Columbus, OH 43219
- 16 c/o William G. Malcom
- 17 Malcom & Cisneros
- 18 915 East Bonneville
- 19 Las Vegas, NV 89101
- 20 MILES, BAUER, BERGSTROM & WINTERS, LLP
- 21 2200 PASEO VERDE PKWY, STE 250
- 22 HENDERSON, NV 89052



An Employee of LAW OFFICE OF
CiCi CUNNINGHAM